

COZEN O'CONNOR
Attorneys for Plaintiffs
Michael J. Sommi, Esq. (MS-7910)
45 Broadway, 16th Floor
New York, New York 10006
(212) 509-9400

03 CV

#1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FEDERAL INSURANCE COMPANY; :
PACIFIC INDEMNITY COMPANY; :
CHUBB CUSTOM INSURANCE :
COMPANY; CHUBB INDEMNITY :
INSURANCE COMPANY; CHUBB :
INSURANCE COMPANY OF CANADA; :
CHUBB INSURANCE COMPANY OF :
NEW JERSEY; GREAT NORTHERN :
INSURANCE COMPANY; VIGILANT :
INSURANCE COMPANY; ZURICH :
AMERICAN INSURANCE COMPANY; :
AMERICAN GUARANTEE AND :
LIABILITY INSURANCE COMPANY; :
AMERICAN ZURICH INSURANCE :
COMPANY; ASSURANCE COMPANY :
OF AMERICA; COLONIAL AMERICAN :
CASUALTY AND SURETY :
INSURANCE COMPANY; FIDELITY :
AND DEPOSIT COMPANY OF :
MARYLAND; MARYLAND :
CASUALTY COMPANY; NORTHERN :
INSURANCE COMPANY OF NEW :
YORK; STEADFAST INSURANCE :
COMPANY; VALIANT INSURANCE :
COMPANY; ONE BEACON :
INSURANCE COMPANY; ONE :
BEACON AMERICA INSURANCE :
COMPANY; AMERICAN EMPLOYERS' :
INSURANCE COMPANY; THE :
CAMDEN FIRE INSURANCE :
ASSOCIATION; HOMELAND :
INSURANCE COMPANY OF NEW :
YORK; CRUM & FORSTER :
INDEMNITY COMPANY; NORTH :

CIVIL ACTION NO.

COMPLAINT

JURY TRIAL DEMANDED

6/4/03

RIVER INSURANCE COMPANY;
UNITED STATES FIRE INSURANCE
COMPANY; AMERICAN
ALTERNATIVE INSURANCE
CORPORATION; GREAT LAKES
REINSURANCE U.K. PLC; AND THE
PRINCETON EXCESS & SURPLUS
LINES INSURANCE COMPANY

Plaintiffs

v.

AL QAIDA; EGYPTIAN ISLAMIC
JIHAD; ASBAT AL-ANSAR; AL
GAMA'A AL-ISLAMIYYA; SALAFIST
GROUP FOR CALL AND COMBAT;
LASHKAR I JANGHVI; LASHKAR-E
TAYYIBA; JEMAAH ISLAMIYA
ORGANIZATION; HEZBOLLAH; ABU
SAYEF GROUP; ALGERIAN ARMED
ISLAMIC GROUP; HAMAS;
PALESTINE ISLAMIC JIHAD; THE
ISLAMIC REPUBLIC OF IRAN;
REPUBLIC OF IRAQ; THE REPUBLIC
OF THE SUDAN; SYRIAN ARAB
REPUBLIC; THE KINGDOM OF SAUDI
ARABIA; OSAMA BIN LADEN;
MUHAMMAD ATIF A/K/A SUBHI
SITTA A/K/A ABU HAFS AL-MASRI;
SAYF AL-ADL; SHAYKH SA'ID A/K/A
MUSTAFA MUHAMMAD AHMAD;
ABU HAFS THE MAURITANIAN A/K/A
MAHFOUZ OULD AL-WALID A/K/A
KHALID AL-SHANQITI; IBN AL-
SHAYKH AL-LIBI; ABU ZUBAYDAH
A/K/A ZAYN AL ABIDIN
MUHAMMAD HUSAYN TARIQ; ABD
AL-HADI AL-IRAQI A/K/A ABU
ABDULLAH; AYMAN AL-ZAWAHIRI;
THIRWAT SALAH SHIHATA A/K/A
MUHAMMAD ALI; TARIQ ANWAR
AL-SAYYID AHMAD A/K/A FATHI
A/K/A AMR AL-FATIH; MUHAMMAD
SALAH A/K/A NASR FAHMI NASR
HASANAYN; MAKHTAB AL-

KHIDAMAT A/K/A AL-KHIFAF; AL- :
 TIHAAD AL ISLAMIYA (AIAI); :
 ISLAMIC ARMY OF ADEN; WAFI :
 HUMANITARIAN ORGANIZATION; :
 AL-RASHID TRUST; MAMOUN :
 DARKAZANLI IMPORT-EXPORT :
 COMPANY; NURJAMAN RIDUAN :
 ISMUDDIN A/K/A HAMBALI; :
 MOHAMMED IQBAL :
 ABDURRAHMAN A/K/A/ ABU JIBRI; :
 BENEVOLENCE INTERNATIONAL :
 FOUNDATION; BENEVOLENCE :
 INTERNATIONAL FUND; BOSANSKA :
 IDEALNA FUTURA; GLOBAL RELIEF :
 FOUNDATION A/K/A FOUNDATION :
 SECOURS MONDIAL; MOUNIR EL :
 MOTASSADEQ; RAMZI BINALSHIBH; :
 ZAKARYA ESSABAR; SAID BAHAJI; :
 TURKISTAN ISLAMIC MOVEMENT; :
 WA'EL HAMZA JULAIIDAN A/K/A AL- :
 HASAN AL MADANI; ADEL BEN :
 SOLTANE; NABIL BENATTIA; :
 YASSINE CHEKKOURI; RIADH :
 JELASSI; MENDI KAMMOUN; SAMIR :
 KISHK; TAREK BEN HABIB :
 MAAROUFI; ABDELHALIM :
 REMADNA; MANSOUR THAER; :
 LAZHAR BEN MOHAMMED TLILI; :
 HABIB WADDANI; AKIDA BANK :
 PRIVATE LIMITED; AKIDA :
 INVESTMENT CO. LTD.; NASREDDIN :
 GROUP INTERNATIONAL HOLDING :
 LTD.; NASCO NASREDDIN HOLDING :
 A.S.; NASCOTEX S.A.; NASREDDIN :
 FOUNDATION; BA TAQWA FOR :
 COMMERCE AND REAL ESTATE :
 COMPANY LTD.; MIGA – :
 MALAYSIAN SWISS, GULF AND :
 AFRICAN CHAMBER, GULF CENTER :
 S.R.L.; NASCOSERVICE S.R.L.; NASCO :
 BUSINESS RESIDENCE CENTER SAS :
 DI NASREDDIN AHMED IDRIS EC; :
 NASREDDIN COMPANY NASCO SAS :
 DI AHMED IDRIS NASSNEDDIN EC; :
 NADA INTERNATIONAL ANSTALT; :
 NASREDDIN INTERNATIONAL :

GROUP LIMITED HOLDING; THE AID :
 ORGANIZATION OF THE ULEMA; :
 AHMED IDRIS NASREDDIN; YOUSSEF :
 NADA; ABDELKADIR MAHMOUD ES :
 SAYED; KHALID AL-FAWAZ; ABU :
 HAMZA AL-MASRI; MOHAMED BEN :
 BELGACEM AOUADI; MOKHTAR :
 BOUGHOUGH; TAREK CHARAABI; :
 SAMI BEN KHEMAIS ESSID; LASED :
 BEN HENI; SOMALIA BRANCH OF :
 THE AL-HARAMAIN ISLAMIC :
 FOUNDATION; BOSNIA- :
 HERZEGOVINA BRANCH OF AL- :
 HARAMAIN ISLAMIC FOUNDATION; :
 UMMA TAMEER-E-NAU (UTN); :
 BASHIR-UD-DIN MAHMOOD; ABDUL :
 MAJEED; S.M. TUFAIL; AL :
 BARAKAAT; AL TAQWA/NADA :
 GROUP; AARAN MONEY WIRE :
 SERVICE, INC.; AL BARAKA :
 EXCHANGE LLC; AL BARAKAAT :
 BANK; AL-BARAKAT BANK OF :
 SOMALIA (BSS); AL-BARAKAT :
 FINANCE GROUP; AL-BARAKAT :
 FINANCIAL HOLDING CO.; AL- :
 BARAKAT GLOBAL :
 TELECOMMUNICATIONS; AL- :
 BARAKAT GROUP OF COMPANIES :
 SOMALIA LIMITED; AL-BARAKAT :
 INTERNATIONAL A/K/A BARACO CO; :
 AL-BARAKAT INVESTMENTS; AL- :
 BARAKAT WIRING SERVICE; AL :
 TAQWA TRADE, PROPERTY AND :
 INDUSTRY COMPANY LIMITED; :
 ASAT TRUST; BANK AL TAQWA :
 LIMITED; BARAKA TRADING :
 COMPANY; BARAKAAT BOSTON; :
 BARAKAAT CONSTRUCTION :
 COMPANY; BARAKAAT :
 ENTERPRISE; BARAKAAT GROUP OF :
 COMPANIES; BARAKAAT :
 INTERNATIONAL; BARAKAAT :
 INTERNATIONAL FOUNDATION; :
 BARAKAAT INTERNATIONAL, INC.; :
 BARAKAAT NORTH AMERICA, INC.; :
 BARAKAAT RED SEA :

TELECOMMUNICATIONS; :
 BARAKAAT TELECOMMUNICATIONS :
 CO. SOMALIA; BARAKAT BANK AND :
 REMITTANCES; BARAKAT :
 COMPUTER CONSULTING (BCC); :
 BARAKAT CONSULTING GROUP :
 (BCG); BARAKAT GLOBAL :
 TELEPHONE COMPANY; BARAKAT :
 INTERNATIONAL COMPANIES :
 (BICO); BARAKAT POST EXPRESS :
 (BPE); BARAKAT REFRESHMENT :
 COMPANY; BARAKAT WIRE :
 TRANSFER COMPANY; BARAKAT :
 TELECOMMUNICATIONS COMPANY :
 LIMITED (BTCLCO); BARAKO :
 TRADING COMPANY, LLC; GLOBAL :
 SERVICES INTERNATIONAL; :
 HEYATUL ULYA; NADA :
 MANAGEMENT ORGANIZATION; :
 PARKA TRADING COMPANY; RED :
 SEA BARAKAT COMPANY LIMITED, :
 SOMALIA INTERNATIONAL RELIEF :
 ORGANIZATION; SOMALIA :
 INTERNET COMPANY; SOMALIA :
 NETWORK AB; YOUSSEF M. NADA & :
 CO. GESELLSCHAFT MBH; YOUSSEF :
 M. NADA; HUSSEIN MAHMUD :
 ABDULLKADIR; ARDIRASIK ADEN; :
 ABBAS ABDI ALI; ABDI ADULAZIZ :
 ALI; YUSAF AHMED ALI; DAHIR :
 UBEIDULLAHI AWEYS; HASSAN :
 DAHIR AWEYS; GARAD JAMA; ALI :
 GHALEB HIMMAT; ALBERT :
 FREDRICH ARMAND HUBER; LIBAN :
 HUSSEIN; AHMED NUR ALI JIM'ALE; :
 ABDULLAHI HUSSEIN KAHIE; :
 MOHAMMED MANSOUR; ZEINAB :
 MANSOUR-FATTAH; ABDULLAH :
 AHMED ABDULLAH A/K/A ABU :
 MARIAM A/K/A ABU MOHAMED AL- :
 MASRI A/K/A SALEH; HAJI ABDUL :
 MANAN AGHA A/K/A ABD AL- :
 MAN'AM SAIYID; AL HAMATI :
 SWEETS BAKERIES; MUHAMMAD :
 AL-HAMATI A/K/A MOHAMMAD :
 HAMD I SADIQ AL-AHDAL A/K/A ABU :

ASIM AL-MAKKI; AMIN AL-HAQ :
 A/K/A DR. AMIN AH HAQ A/K/A :
 MUHAMMAD AMIN A/K/A DR. AMIN :
 UL-HAQ; SAQAR AL-SADAWI; :
 AHMAD SA'ID AL-KADR A/K/A ABU :
 ABD AL-RAHMAN AL-KANADI; :
 ANAS AL-LIBY A/K/A ANAS AL-LIBI :
 A/K/A NAZIM AL-RAGHIE A/K/A :
 NAZIH ABDUL HAMED AL-RAGHIE :
 A/K/A ANAS AL-SABAI; AHMAD :
 IBRAHIM AL- MUGHASSIL A/K/A :
 ABU OMRAN A/K/A AHMED :
 IBRAHIM AL-MUGHASSIL; :
 ABDELKARIM HUSSEIN MOHAMED :
 AL-NASSER; AL-NUR HONEY PRESS :
 SHOPS A/K/A AL-NUR HONEY :
 CENTER; YASIN AL-QADI A/K/A :
 SHAYKH YASSIN ABDULLAH KADI :
 A/K/A YASIN KAHDI; SA'D AL- :
 SHARIF; AL-SHIFA' HONEY PRESS :
 FOR INDUSTRY AND COMMERCE; :
 IBRAHIM SALIH MOHAMMED AL- :
 YACOUB; AHMED MOHAMMED :
 HAMED ALI A/K/A AHMED :
 MOHAMMED ABDUREHMAN A/K/A :
 ABU FATIMA A/K/A ABU ISLAM :
 A/K/A ABU KHADIJAH A/K/A :
 AHMED HAMED A/K/A AHMED THE :
 EGYPTIAN A/K/A AHMED AHMED :
 A/K/A AHAMAD AL-MASRI A/K/A :
 ABU ISLAM AL-SURIR A/K/A AHMED :
 MOHAMMED ALI A/K/A HAMED ALI :
 A/K/A AHMED HEMED A/K/A AHMED :
 SHIEB A/K/A SHUAIB; ALI ATWA :
 A/K/A AMMAR MANSOUR BOUSLIM :
 A/K/A HASSAN ROSTOM SALIM; :
 MUHSIN MUSA MATWALLI ATWAH :
 A/K/A ABDEL RAHMAN A/K/A :
 ABDUL RAHMAN A/K/A ABDUL :
 RAHMAN AL-MUHAJIR A/K/A :
 MOHAMMED K.A. AL-NAMER; BILAL :
 BIN MARWAN; AYADI CHAFIQ BIN :
 MUHAMMAD A/K/A BEN :
 MUHAMMAD AIADI A/K/A BEN :
 MUHAMMAD AIADY A/K/A BEN :
 MUHAMMAD AYADI CHAFIK A/K/A :

BEN MUHAMMAD AYADI SHAFIQ; :
 MAMOUN DARKAZANLI; ALI SAED :
 BIN ALI EL-HOORIE A/K/A ALI SAED :
 BIN ALI AL-HOURI A/K/A ALI SAED :
 BIN ALI EL-HOURI; MUSTAFA :
 MOHAMMED FADIIL A/K/A ABD AL :
 WAKIL AL MASRI A/K/A ABU AL- :
 NUBI A/K/A HASSAN ALI A/K/A ABU :
 ANIS A/K/A MOUSTAFA ALI ELBISHY :
 A/K/A MUSTAFA MUHAMAD FADIL :
 A/K/A MUSTAFA FAZUL A/K/A :
 HUSSEIN A/K/A ABU JIHAD A/K/A :
 KHALID A/K/A NU MAN A/K/A :
 MUSTAFA MOHAMMED A/K/A ABU :
 YUSSRR; AHMED KHALFAN :
 GHAILANI A/K/A AHMED THE :
 TANZANIAN A/K/A FOOPIE A/K/A :
 FUPI A/K/A ABU BAKR AHMAD A/K/A :
 A. AHMED A/K/A ABUBAKAR :
 AHRMED A/K/A ABUBAKAR K. :
 AHMED A/K/A ABUBAKAR KHALFAN :
 AHMED A/K/A ABUBAKARY K. :
 AHMED A/K/A AHMED KHALFAN :
 AHMED A/K/A AHMAD AL TANZANI :
 A/K/A AHMED KHALFAN ALI A/K/A :
 ABU BAKR A/K/A ABUBAKARY :
 KHALFAN AHMED GHAILANI A/K/A :
 AHMED GHAILANI A/K/A AHMAD :
 KHALAFAN GHILANI A/K/A :
 MAHAFUDH ABUBAKAR AHMED :
 ABDALLAH HUSSEIN A/K/A ABU :
 Khabar A/K/A AHMED KHALFAN :
 A/K/A SHARIFF OMAR MOHAMMED; :
 RIAD HIJAZI A/K/A ABU-AHMAD AL- :
 AMRIKI A/K/A ABU-AHMAD AL- :
 HAWEN A/K/A RASHID AL- :
 MAGHRIBI A/K/A ABU-AHMAD AL- :
 SHAHID A/K/A M RAED HIJAZI; :
 HASAN IZZ-AL-DIN A/K/A AHMED :
 GARBAYA A/K/A SA-ID A/K/A SAMIR :
 SALWWAN; JAISH-I-MOHAMMED :
 A/K/A ARMY OF MOHAMMED; :
 JAM'YAH TA'AWUN AL-ISLAMIA :
 A/K/A JAM'IYAT AL TA'AWUN AL :
 ISLAMIYYA A/K/A JIT A/K/A :
 SOCIETY OF ISLAMIC :

COOPERATION; MUFTI RASHID :
 AHMAD LADEHYANOY A/K/A MUFTI :
 RASHEED AHMA A/K/A MUFTI :
 RASHID AHMAD LUDHIANVI A/K/A :
 MUFTI RASHID AHMAD :
 WADEHYANOY; FAZUL ABDULAH :
 MOHAMMED A/K/A FAZUL :
 ABDALLA A/K/A FAZUL ADBALLAH :
 A/K/A ABU AISHA A/K/A ABU SEIF :
 AL SUDANI A/K/A FADEL :
 ABDALLAH MOHAMMED ALI A/K/A :
 ABDALLA FAZUL A/K/A ABDALLAH :
 FAZUL A/K/A ABDALLAH :
 MOHAMMED FAZUL A/K/A HAROON :
 FAZUL A/K/A HARUN FAZUL A/K/A :
 HAROON A/K/A FADHIL HAROUN :
 A/K/A HARUN A/K/A ABU LIJMAN :
 A/K/A FAZUL MOHAMMED A/K/A :
 FAZUL ABDILAH MOHAMMED :
 A/K/A FOUAD MOHAMMED A/K/A :
 FADIL ABDALLAH MUHAMAD; :
 KHALID SHAIKH MOHAMMED A/K/A :
 SALEM ALI A/K/A FAHD BIN :
 ABDALLAH BIN KHALID A/K/A :
 ASHRAF REFAAT NABITH HENIN :
 A/K/A KHALID ADBUL WADOOD; :
 FAHID MOHAMMED ALLY MSALAM :
 A/K/A USAMA AL-KINI A/K/A FAHID :
 MOHAMMED ALLY A/K/A FAHAD :
 ALLY MSALAM A/K/A FAHID :
 MOHAMMED ALI MSALAM A/K/A :
 MOHAMMED ALLY MSALAM A/K/A :
 FAHID MOHAMMED ALI MUSALAAM :
 A/K/A FAHID MUHAMAD ALI SALEM; :
 RABITATRUST; ANSAR AL-ISLAM :
 (AI) A/K/A JUND AL-ISLAM; YOUSSEF :
 ABDAOUI A/K/A ABU ABDULLAH :
 A/K/A ABDELLAH A/K/A ABDULLAH; :
 MOHAMMED AMINE AKLI A/K/A :
 SAMIR A/K/A KALI SAMI A/K/A :
 ELIAS; MOHREZ AMDOUNI A/K/A :
 FABIO FUSCO A/K/A MOHAMMED :
 HASSAN A/K/A TUALE ABU; CHIHEB :
 BEN MOHAMED AYARI A/K/A ABU :
 HOHEM HICHEM; MONDHER :
 BAAZAOU A/K/A HAMZA; LIONEL :

DUMONT A/K/A BILAL A/K/A HAMZA :
 A/K/A JACQUES BROUGERE, :
 MOUSSA BEN AMOR ESSAADI A/K/A :
 DAH DAH A/K/A ABDELRAHMMAN :
 A/K/A BECHIR; RACHID FEHAR A/K/A :
 AMINEDEL BELGIO A/K/A DJAFFAR; :
 BRAHIM BEN HEDILI HAMAMI; :
 KHALIL JARRAYA A/K/A KHALIL :
 YARRAYA A/K/A AZIZ BEN NARVAN :
 ABDEL' A/K/A AMRO A/K/A OMAR :
 A/K/A AMROU A/K/A AMR; MOUNIR :
 BEN HABIB JERRAYA A/K/A :
 YARRAYA; FOUZI JENDOUBI A/K/A :
 SAID A/K/A SAMIR; FETHI BEN :
 REBAI MASRI A/K/A AMOR A/K/A :
 OMAR ABU A/K/A FETHI ALIC; NAJIB :
 OUAZ; AHMED HASNI RARRBO :
 A/K/A ABDALLAH A/K/A ABDULLAH; :
 NEDAL SALEH A/K/A HITEM; :
 ABDELGHANI MZOUDI; GUI BUDDIN :
 HEKMATYAR; IMAD MUGHNIYEH; :
 MUHAMMAD OMAR; ISLAMIC :
 INTERNATIONAL BRIGADE; SPECIAL :
 PURPOSE ISLAMIC REGIMENT, :
 RIYADUS-SALIKHIN RECOGNIZANCE :
 AND SABOTAGE BATTALION OF :
 CHECHEN MARTYRS; PRINCESS :
 HAIFA AL-FAISAL; PRINCE VANDAR :
 IBAN SULTAN; OSAMA BASSNAN; :
 OMAR AL-BAYOUMI; FAHAD AL- :
 THUMAIRY; WORLD ASSEMBLY OF :
 MUSLIM YOUTH; SHEIKH AHMED :
 SALIM SWEDAN; MUHAMMAD ABU- :
 ISLAM; ABDULLAH 'QASSIM; :
 HASHIM ABDULRAHMAN; JAMAL :
 AL-BADAWI; MOHAMMED OMAR :
 AL-HARAZI; WALID AL-SOUROURI; :
 FATHA ADBUL RAHMAN; YASSER :
 AL-AZZANI; JAMAL BA KHORSH; :
 AHMAD AL-SHINNI; JAMIL QASIM :
 SAEED; ABU ABDUL RAHMAN; :
 MOHAMED BAYAZID; ABU MUSAB :
 ZARQAWI; SHEIKH OMAR BAKRI :
 MUHAMMAD; ABDUL FATTAH :
 ZAMMAR; GHASOUB AL ABRASH :
 GHALYOUN A/K/A ABU MUSAB; :

BENSAYAH BELKACEM; SABIR :
 LAMAR; WADII EL-HAGE; WALI :
 KHAN AMIN SHAH; ZACARIAS :
 MOUSSAOUI; THE TALIBAN; :
 MAULVI ABDUL KABIR; JALIL :
 SHINWARI; NOOR JALIL; ABDEL :
 HUSSEIN; ADU AGAB; NATIONAL :
 ISLAMIC FRONT; HASSAN TURABI; :
 ISS EL-DIN EL SAYED; LASHKAR :
 REDAYAN-E-ISLAMI; AHMAD SALAH :
 A/K/A SALIM; ABD AL-MUSHIN AL- :
 LIBI; ABDUL RAHMAN KHALED BIN :
 MAHFOUZ; ABDUL RAHMAN YASIN; :
 ABDULLA AL OBAID; ABDULA BIN :
 LADEN; ADVICE AND :
 REFORMATION COMMITTEE; :
 AFGHAN SUPPORT COMMITTEE; AL :
 KHALEEJIA FOR EXPORT :
 PROMOTION AND MARKETING :
 COMPANY; AL-HARAMAIN A/K/A :
 AL-HARAMAIN FOUNDATION; :
 ENAAM M. ARNANOUT; :
 INTERNATIONAL DEVELOPMENT :
 FOUNDATION; INTERNATIONAL :
 ISLAMIC RELIEF ORGANIZATION; :
 INTERNATIONAL INSTITUTE OF :
 ISLAMIC THOUGHT; ISLAMIC :
 CULTURAL INSTITUTE OF MILAN; :
 JAMAL BARZINJI; KHALED BIN :
 MAHFOUZ; MOHAMMED JAMAL :
 KHALIFA; MOHAMMED SALIM BIN :
 MAHFOUZ; MUSLIM WORLD :
 LEAGUE; NATIONAL COMMERCIAL :
 BANK; PRINCE NAYEF BIN :
 ABDULAZIZ AL SAUD; PRINCE :
 SULTAN BIN ABDULAZIZ AL SAUD; :
 RABII HADDAH; SAAR :
 FOUNDATION; SAUDI SUDANESE :
 BANK; AL SHAMAL ISLAMIC BANK; :
 SHEIKH ABU BDUL AZIZ NAGI; :
 SHEIK ADIL GALIL BATARGY A/K/A :
 ADEL ABDUL JALIL BATTERJEE; :
 SULEIMAN ABDEL AZIZ AL RAJHI; :
 TABA INVESTMENTS; TANZANITE :
 KING; ULEMA UNION OF :
 AFGHANISTAN; WADI AL AQIQ; :

INFOCUS TECH OF MALAYSIA; :
 YAZID SUFAAT OF KUALA LUMPUR :
 MALAYSIA; AL-SHAYKH AL-IRAQI; :
 AZZAM SERVICE CENTER; ABU :
 HAJER AL IRAQI; MOHAMMED AL :
 FAISAL AL SAUD; AL-HIJRAH :
 CONSTRUCTION AND :
 DEVELOPMENT LIMITED; GUM :
 ARABIC COMPANY LIMITED; AL :
 SIAMAL FOR INVESTMENT AND :
 DEVELOPMENT; SALEH ABDULLAH :
 KAMEL; AL BARAKA INVESTMENT :
 AND DEVELOPMENT; SAUDI :
 DALLAH AL BARAKA GROUP LLC; :
 ISLAMIC INVESTMENT COMPANY OF :
 THE GULF; DAR-AL-MAAL AL :
 ISLAMI; AL-BIR SAUDI :
 ORGANIZATION; MOHAMMAD S. :
 MOHAMMAD; TADAMON ISLAMIC :
 BANK; MUSTASIM ABDEL-RAHIM; :
 NATIONAL FUND FOR SOCIAL :
 INSURANCE; ABDUL-RAHIM :
 MOHAMMED HUSSEIN; AL AMN AL- :
 DAKHILI; AL AMN AL-KHARIJI; ABD :
 AL SAMAD AL-TA'ISH; MOHAMED :
 SADEEK ODEH; ABDEL BARRY; :
 AHMAD SALAH A/K/A SALIM; :
 MAHDI CHAMRAN SAVEHI; :
 MOHAMMED SARKAWI; AL TAWHID; :
 HAJI MOHAMAD AKRAM; :
 ABDALLAH OMAR; UMAR FARUQ; :
 ABD AL-RAHIM AL-NASHIRI; TURKI :
 AL FAISAL AL SAUD A/K/A PRINCE :
 TURKI; PRINCE ABDULLAH AL :
 FAISAL BIN ABDULAZIZ AL SAUD :
 A/K/A PRINCE ABDULLAH; PRINCE :
 SALMAN BIN ABDUL AZIZ AL SAUD :
 A/K/A PRINCE SALMAN; ZOUAYDI :
 A/K/A MUHAMMED GALEB KALAJE :
 ZOAAAYDI A/K/A ABU TALHA; :
 MULLAH KAKSHAR; ABDULAZIZ :
 BIN ABDUL RAHMAN AL SAUD; :
 ARAFAT EL-ASAHI; HAYDAR :
 MOHAMED BIN LADEN; :
 MOHAMMED BIN ABDULRAHMAN :
 AL ARIEFY; FAISAL GROUP :

HOLDING COMPANY; AL FAISALIAH :
 GROUP; BASHSH HOSPITAL; :
 MUSHAYT FOR TRADING :
 ESTABLISHMENT; ABDULLAH BIN :
 ABDUL MUHSEN AL TURKI A/K/A AL :
 TURKI; SAUDI HIGH COMMISSION :
 A/K/A THE SAUDI HIGH RELIEF :
 COMMISSION; ABDUL AZIZ AL :
 IBRAHIM A/K/A AL IBRAHIM; TAREK :
 AYOUBI; AL ANWA; HELP AFRICAN :
 PEOPLE; IBRAHIM BIN ABDUL AZIZ :
 AL IBRAHIM FOUNDATION; MERCY :
 INTERNATIONAL RELIEF AGENCY; :
 ISLAMIC MOVEMENT OF :
 UZBEKISTAN; SAUDI BIN LADEN :
 GROUP; BAKR M. BIN LADEN; :
 SALEM BIN LADEN; SALEH GAZAZ; :
 MOHAMMED BAHARETH; :
 ABDULLAH BIN SAID; MOHAMMED :
 NUR RAHMI; TAREK M. BIN LADEN; :
 OMAR M. BIN LADEN, MOHAMMED :
 BIN LADEN ORGANIZATION; SAUDI :
 BIN LADEN INTERNATIONAL :
 COMPANY; YESLAM M. BIN LADEN; :
 GLOBAL DIAMOND RESOURCE; :
 HUMAN CONCERN INTERNATIONAL :
 SOCIETY; TALAL MOHAMMED :
 BADKOOK; DR. MOHAMAN ALI :
 ELGARI; NEW DIAMOND HOLDINGS; :
 M.M. BADKOOK COMPANY FOR :
 CATERING & TRADING; AL- :
 MUSTAQBAL GROUP; NATIONAL :
 MANAGEMENT CONSULTANCY :
 CENTER; AL-RAJHI BANKING & :
 INVESTMENT CORPORATION; SALEH :
 ABDULAZIZ AL-RAJHI; ABDULLAH :
 SULAIMAN AL-RAJHI; KHALID :
 SULAIMAN AL-RAJHI; AL-WATANIA :
 POULTRY; MAR-JAC POULTRY; MAR- :
 JAC INVESTMENTS, INC.; PIEDMONT :
 POULTRY; SALIM BIN MAHFOUZ; :
 SNCB CORPORATE FINANCE :
 LIMITED; SNCB SECURITIES LIMITED :
 IN LONDON; SNCB SECURITIES :
 LIMITED IN NEW YORK; SAUDI :
 ECONOMIC AND DEVELOPMENT :

COMPANY; ZAKAT COMMITTEE; :
 RED CRESCENT SAUDI COMMITTEE; :
 BLESSED RELIEF (MUWAFaq) :
 FOUNDATION; ABDULKARIM :
 KHALED UUSUF ABDULLA; :
 ABDUL RAHMAN BIN KHALID BIN :
 MAHFOUZ; AL-BIRR; HISHAM; HEZB- :
 E-ISLAMI; SAIF AL ISLAM EL :
 MASRY; SYED SULEMAN AHMER; :
 MAZIN M.H. BAHARETH; SHAHIR :
 ABDULRAOOF BATTERJEE; ZAHIR H. :
 KAZMI; MUZAFFAR KHAN; SOLIMAN :
 J. KHUDEIRA; JAMAL NYRABEH; :
 AHMAD AJAJ; SUCCESS :
 FOUNDATION; ABDULRAHMAN :
 ALAMOUDI; AMERICAN MUSLIM :
 FOUNDATION; MOHAMMED :
 OMEISH; ADNAN BASHA; MAHMOUD :
 JABALLAH; ARAFAT EL-ASHI; MORO :
 ISLAMIC LIBERATION FRONT; :
 JAMAL AHMED MOHAMMED; :
 MOHAMMED KHATIB; SAUDI JOINT :
 RELIEF COMMITTEE; TAIBAH :
 INTERNATIONAL AID ASSOCIATION; :
 ISLAMIC AFRICAN RELIEF AGENCY; :
 TARIK HAMD; FAZEH AHED; :
 SANABIL AL-KHAIR; SANA-BELL, :
 INC.; SANABEL AL-KHEER, INC.; :
 KHALED NOURI; ABDULLAH M. AL- :
 MAHDI; TAREQ M. AL-SWAIDAN; :
 ABDUL AL-MOSLAH; SALAH :
 BADAHDH; HASSAN A.A. :
 BAHFZALLAH; M. YAQUB MIRZA; :
 IHAB ALI; SAMIR SALAH; IBRAHIM :
 HASSABELLA; HISHAM AL-TALIB; :
 ABU SULAYMAN; AHMED TOTONJI; :
 IQBAL YUNUS; M. OMAR ASHRAF; :
 MOHAMMED JAGHLIT; MUHAMMAD :
 ASHRAF; SHERIF SEDKY; AFRICAN :
 MUSLIM AGENCY; ARADI, INC.; :
 GROVE CORPORATE, INC.; :
 HERITAGE EDUCATION TRUST; :
 MENA CORPORATION; RESTON :
 INVESTMENTS, INC.; SAFA TRUST; :
 STERLING CHARITABLE GIFT FUND; :
 STERLING MANAGEMENT GROUP; :

YORK FOUNDATION; NATIONAL :
 DEVELOPMENT BANK; DALLAH :
 AVCO TRANS ARABIA CO. LTD.; :
 OMAR AL BAYOUMI A/K/A ABU :
 IMARD; MASJED AL MADINAH AL :
 MUNAWARAH A/K/A MASJID AT :
 MADINAH AL MUNAWARAH; AQSA :
 ISLAMIC BANK; AQEEL AL-AQEEL; :
 MANSOURI AL-KADI; SOLIMAN H.S. :
 AL-BUTHE, PEROUZ SEDA GHATY; :
 AHMED IBRAHIM AL NAJJAR; ADEL :
 MUHAMMAD SADIQ BIN KAZEM; :
 SAUDI AMERICAN BANK; :
 ABDULAZIZ BIN HAMAD; KHALIL A. :
 KORDI; RASHID M. AL ROMAIZAN; :
 ABDULAZIZ BIN HAMAD AL :
 GOSAIBE; SAUDI CEMENT COMPANY :
 IN DAMMAN; OMAR SULAIMAN AL- :
 RAJHI; ARAB CEMENT COMPANY; :
 ZEINAB MANSOUR-FATTOUH; :
 MOHAMMED CHEHADE; HAZEM :
 RAGAB; MOHAMMED ALCHURBAJI; :
 MUSTAFA AL-KADIR; ABU AL-MAID; :
 AL SHAMAL ISLAMIC BANK A/K/A :
 SHAMEL BANK A/K/A BANK EL :
 SHAMAR; SULAIMAN AL-ALI; :
 KHALED NOURI; MUSLIM WORLD :
 LEAGUE OFFICES; ABDULLAH BIN :
 SALEH AL-OBAID; TAHA JABER AL- :
 ALWANI; INTERNATIONAL :
 INSTITUTE OF ISLAMIC THOUGHT; :
 IBRAHIM S. ABDULLAH; :
 MOHAMMED BIN FARIS; DR. :
 MAHMOUD DAKHIL; MOHAMMED :
 AL FAISAL AL SAUD; ABDUL :
 RAHMAN AL SWAILEM; DELTA OIL :
 COMPANY; NIMIR, LLC; ARAB BANK, :
 PLC; DUBAI ISLAMIC BANK; NADA :
 MANAGEMENT ORGANIZATION, SA; :
 ARY GROUP; ISLAMIC CULTURAL :
 CENTER OF GENEVA; HANI :
 RAMADAN; THE COMMITTEE FOR :
 THE DEFENSE OF LEGITIMATE :
 RIGHTS; PROYECTOS Y :
 PROMOCIONES ISO; AFAMIA, SL; :
 COBIS; ABRASH COMPANY; :

PROMOCIONES Y CONSTRUCCIONES :
 TETUAN PRICOTE, S.A.; CONTRATAS :
 GIOMA; EUROCOVIA OBRAS, S.A.; :
 PROYECTOS Y PROMOCIONES :
 PARADISE, S.L.; PROYECTOS EDISPAN; :
 GHASOUB AL ABRASH; MUSTAF :
 AHMED AL-HISAWI A/K/A SHEIK :
 SAEED; IMAD EDDIN BARAKAT :
 YARKAS A/K/A ABU DAHDAH; :
 MUHAMMED GALEB KALAJE :
 ZUOYADI A/K/A ABU TALHA; :
 BASSAM DALATI SATUT; :
 ABDALRAHMAN ALARNOUT ABU :
 ALJER A/K/A ABU OBED; :
 MOHAMMED KHAIR AL SAQQA :
 A/K/A ABU AL DARDA; GHASOUB AL :
 ABRASH GHALYOUN A/K/A ABU :
 MUSAB; MOHAMMED ALI SAYED :
 MUSHAYT; MOHAMMED HUSSEIN :
 AL-AMOUDI; ABU QATADA AL- :
 FILISTINI A/K/A ABU ISMAIL A/K/A :
 ABU UMAR A/K/A ABU OMAR OMAR :
 A/K/A ABU UMAR TAKFIRI A/K/A :
 ABU UMAR UMAR A/K/A ALI :
 SAMMAN UTHMAN A/K/A OMAR :
 MAHMOUD UTHMAN A/K/A UMAR :
 UTHMAN; YASSIR AL-SIRRI A/K/A :
 AMMAR; MOHAMMED AL MASSARI; :
 LUJAIN AL-IMAN; ZIYAD KHALEEL; :
 IBRAHIM BAH; ABU ZUBAYDAH; :
 MAMDOUH MAHMUD SALIM A/K/A :
 ABU HAJER AL IRAQI; SHEIKH :
 ABDULLAH AZZAM A/K/A ABU :
 MUHAMMED; ABDULLAH SAMIL :
 BAHMADAN; ESSAM AL RIDI; OMAR :
 ABU OMAR; MOHAMMED ALI :
 HASAN AL MOAYAD; AL FAROOQ :
 MOSQUE; YOUSEF JAMEEL; :
 IBRAHIM MUHAMMED AFANDI; :
 MOHAMMED BIN ABDULLAH AL- :
 JOMAITH; ABDULRAHMAN HASSAN :
 SHARBATLY; SALAHUDDIN :
 ABDULJAWAD; AHMED ZAKI :
 YAMANI; AHMAD AL HARBI; :
 MOHAMMED AL-ISSAI; HAMAD :
 HUSSAINI; ABU RIDA AL SURI A/K/A :

MOHAMMED LOAY BAYAZID; SAUDI :
 RED CRESCENT; AHMED BRAHIM; :
 ABU MUSAB AL-ZARQAWI; ABU :
 IBRAHIM AL-MASRI; DAR AL MAAL :
 AL ISLAMI TRUST; DMI :
 ADMINISTRATIVE SERVICES, S.A.; :
 ISLAMIC ASSEMBLY OF NORTH :
 AMERICA; SALMAN AL-OUDA; :
 SAFAR AL-HAWALI; SALEH AL- :
 HUSSAYEN; SAMI OMAR AL- :
 HUSSAYEN; MUHAMMED J. FAKIHI; :
 QUEEN CITY CIGARETTES AND :
 CANDY; AGUS BUDIMAN; AL- :
 BARAKA BANKCORP, INC.; AHMED :
 RESSAM; SAID BAHAJI; ZAKARIYA :
 ESSABAR :
 :
 Defendants :

The above-captioned plaintiffs, by and through their attorneys, Cozen O'Connor, complaining of the above-captioned defendants, do hereby allege the following:

I. PARTIES

1. Plaintiff, Federal Insurance Company ("Federal"), is a corporation organized and existing under the laws of the State of Indiana, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, Federal was engaged in the business of issuing policies of insurance.

2. Plaintiff, Pacific Indemnity Company ("Pacific"), is a corporation organized and existing under the laws of the State of Wisconsin, with a principal place of business located at 330 East Kilbourne Avenue, Suite 1450, Milwaukee, Wisconsin 53202. At all times material hereto, Pacific was engaged in the business of issuing policies of insurance.

3. Plaintiff, Chubb Custom Insurance Company ("Chubb Custom"), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, Chubb Custom was engaged in the business of issuing policies of insurance.

4. Plaintiff, Chubb Indemnity Insurance Company ("Chubb Indemnity"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 55 Water Street, New York, New York 10041. At all times material hereto, Chubb Indemnity was engaged in the business of issuing policies of insurance.

5. Plaintiff, Chubb Insurance Company of Canada ("CICC"), is a corporation organized and existing under the laws of the Province of Ontario, Canada, with a principal place of business located at One Financial Plaza, One Adelaide Street East, Floor 16, Toronto, M5C 2V9 Ontario, Canada. At all times material hereto, CICC was engaged in the business of issuing policies of insurance.

6. Plaintiff, Chubb Insurance Company of New Jersey ("CICNJ"), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, CICNJ was engaged in the business of issuing policies of insurance.

7. Plaintiff, Great Northern Insurance Company ("Great Northern"), is a corporation organized and existing under the laws of the State of Minnesota, with a principal place of business located at 1000 Pillsbury Center, Minneapolis, Minnesota

55402. At all times material hereto, Great Northern was engaged in the business of issuing policies of insurance.

8. Plaintiff, Vigilant Insurance Company ("Vigilant"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 55 Water Street, New York, New York 10038. At all times material hereto, Vigilant was engaged in the business of issuing policies of insurance.

9. Plaintiff, Zurich American Insurance Company ("Zurich"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Zurich was engaged in the business of issuing policies of insurance.

10. Plaintiff, American Guarantee and Liability Insurance Company ("American Guarantee"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, American Guarantee was engaged in the business of issuing policies of insurance.

11. Plaintiff, American Zurich Insurance Company ("American Zurich"), is a corporation organized and existing under the laws of the State of Illinois, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, American Zurich was engaged in the business of issuing policies of insurance.

12. Plaintiff, Assurance Company of America ("Assurance of America"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196.

At all times material hereto, Assurance of America was engaged in the business of issuing policies of insurance.

13. Plaintiff, Colonial American Casualty and Surety Insurance Company ("Colonial American"), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Colonial American was engaged in the business of issuing policies of insurance.

14. Plaintiff, Fidelity and Deposit Company of Maryland ("Fidelity"), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Fidelity was engaged in the business of issuing policies of insurance.

15. Plaintiff, Maryland Casualty Company ("Maryland"), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Maryland was engaged in the business of issuing policies of insurance.

16. Plaintiff, Northern Insurance Company of New York ("Northern"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Northern was engaged in the business of issuing policies of insurance.

17. Plaintiff, Steadfast Insurance Company ("Steadfast"), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of

business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Steadfast was engaged in the business of issuing policies of insurance.

18. Plaintiff, Valiant Insurance Company ("Valiant"), is a corporation organized and existing under the laws of the State of Iowa, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Valiant was engaged in the business of issuing policies of insurance.

19. Plaintiff, One Beacon Insurance Company ("One Beacon"), is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, One Beacon was engaged in the business of issuing policies of insurance.

20. Plaintiff, One Beacon America Insurance Company ("One Beacon America"), is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, One Beacon America was engaged in the business of issuing policies of insurance.

21. Plaintiff, American Employers' Insurance Company ("American Employers"), is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, American Employers was engaged in the business of issuing policies of insurance.

22. Plaintiff, The Camden Fire Insurance Association ("Camden"), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108.

At all times material hereto, Camden was engaged in the business of issuing policies of insurance.

23. Plaintiff, Homeland Insurance Company of New York ("Homeland"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, Homeland was engaged in the business of issuing policies of insurance.

24. Plaintiff, Crum & Forster Indemnity Company ("Crum & Forster"), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 305 Madison Avenue, Morristown, New Jersey 07960. At all times material hereto, Crum & Forster was engaged in the business of issuing policies of insurance.

25. Plaintiff, North River Insurance Company ("North River"), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 305 Madison Avenue, Morristown, New Jersey 07960. At all times material hereto, North River was engaged in the business of issuing policies of insurance.

26. Plaintiff, United States Fire Insurance Company ("United States Fire"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 395 Madison Avenue, Morristown, New Jersey 07960. At all time material hereto, United States Fire was engaged in the business of issuing policies of insurance.

27. Plaintiff, American Alternative Insurance Corporation ("American Alternative"), is a corporation organized and existing under the laws of the State of

Delaware, with a principal place of business located at 555 College Road East, Princeton, New Jersey 08543. At all times material hereto, American Alternative was engaged in the business of issuing policies of insurance.

28. Plaintiff, Great Lakes Resinsurance U.K. PLC ("Great Lakes"), is a corporation organized and existing under the laws of the United Kingdom, with a principal place of business located at 1 Minster Court, Mincing Lane, London, England EC3R 7YH. At all times material hereto, Great Lakes was engaged in the business of issuing policies of insurance.

29. Plaintiff, The Princeton Excess & Surplus Lines Insurance Company ("Princeton Excess"), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 555 College Road East, Princeton, New Jersey 08543. At all times material hereto, Princeton Excess was engaged in the business of issuing policies of insurance.

30. Defendant, al Qaida, is a designated Foreign Terrorist Organization ("FTO"), pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Established by defendant Osama bin Laden in the late 1980's, al Qaida is a global network of several thousand terrorist cells, members, associates and supporters, dedicated to the establishment of a pan-Islamic Caliphate throughout the world. The network's strength is reinforced by its ties to other FTOs, extremist organizations and sympathetic individuals and State Sponsors. Al Qaida frequently functions through, in concert with, or with the support of, the terrorist organizations and groups that operate under its umbrella or with its support. In February 1998, al Qaida issued a *fatwa* under the banner "the World Islamic Front for

Jihad Against Jews and Crusaders,” saying it was the duty of all Muslims to kill United States citizens - civilian or military - and their allies everywhere.

31. Defendant, Egyptian Islamic Jihad, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Egyptian Islamic Jihad operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. Ayman al-Zawahiri, a prominent leader of Egyptian Islamic Jihad, has served as a member of al Qaida’s leadership council, known as the *shura*, since al Qaida’s inception. According to the United States government, Egyptian Islamic Jihad merged with al Qaida at some point prior to June 2001, but retains the capacity to commit acts of international terrorism independently.

32. Defendant, Asbat al-Ansar, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Asbat al-Ansar operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

33. Defendant, Al Gama’a al-Islamiyya, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Al Gama’a al-Islamiyya operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. A senior official of Al Gama’a al-Islamiyya signed al Qaida’s February 1998 *fatwa* calling for attacks against the United States.

34. Defendant, Salafist Group for Call and Combat, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Salafist Group for Call and Combat

operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

35. Defendant, Lashkar I Janghvi, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Lashkar I Janghvi operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

36. Defendant, Lashkar-e Tayyiba, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Lashkar-e-Tayyiba operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

37. Defendant, Jemaah Islamiya Organization, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Jemaah Islamiya Organization operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

38. Defendant, Hezbollah, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Hezbollah operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. The relationship between Hezbollah and al Qaida was forged during meetings between Osama bin Laden and Imad Mughniyah, Hezbollah's chief of operations, and has included coordination on explosives and tactics training, money laundering, weapons smuggling and acquisition of forged identification documents. According to United States intelligence officials, Hezbollah operates under the direction, and by virtue of the direct license, of the Iranian

and Syrian governments. Hezbollah is, in effect, an agency and instrumentality of the Iranian and Syrian governments.

39. Defendant, Abu Sayef Group, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Abu Sayef Group operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

40. Defendant, Algerian Armed Islamic Group a/k/a GIA, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Algerian Armed Islamic Group operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

41. Defendant, HAMAS, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. HAMAS operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

42. Defendant, Palestine Islamic Jihad, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Palestine Islamic Jihad operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

43. Defendant, The Islamic Republic of Iran ("Iran"), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

44. Defendant Iran has long provided material support and resources to al Qaida. According to United States intelligence reports, the relationship between Iran and

al Qaida dates to the early 1990's, when al Qaida officials met with Iranian intelligence officials to establish an anti-American partnership.

45. According to the U.S. government, Iran has harbored, and continues to harbor, senior members of the al Qaida terrorist network. Iran permits those al Qaida operatives to use the cloak of Iran's state sovereignty to shield al Qaida's operations, including the recruitment of new members, training of terrorist cells, and coordination, planning and funding of terrorist attacks throughout the world.

46. In addition to its extensive direct support of al Qaida, defendant Iran has long provided material support and resources to Egyptian Islamic Jihad, Salafist Group for Call and Combat and Hezbollah. As set forth above, Hezbollah is, in effect, an agency and instrumentality of the Iranian government.

47. By virtue of its merger with Egyptian Islamic Jihad, and affiliation with Salafist Group for Call and Combat and Hezbollah, al Qaida has materially benefited from Iran's sponsorship of those FTOs. Indeed, according to the testimony of Ali Mohamed, a U.S. green beret who pleaded guilty to conspiring with defendant Osama bin Laden to bomb U.S. embassies in Africa, Iran used Hezbollah to supply explosives and explosives training to al Qaida operatives.

48. Defendant, Republic of Iraq ("Iraq"), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

49. Defendant Iraq has long provided material support and resources to al Qaida, including training in document forgery, bomb making and poison and gas production.

50. According to the U.S. government, defendant Iraq has harbored senior members of the al Qaida terrorist network. Iraq permitted those al Qaida operatives to use the cloak of Iraq's state sovereignty to shield al Qaida's operations, including the recruitment of new members, training of terrorist cells, and coordination, planning and funding of terrorist attacks throughout the world.

51. At all times material hereto, defendant Iraq operated terrorist training camps within its borders, at which defendant Iraq provided training to members of various terrorist organizations, including members of the al Qaida terrorist network. One such camp was equipped with a commercial airliner fuselage, used by defendant Iraq to train terrorist operatives, including al Qaida members, in hijacking techniques and procedures.

52. Defendant, The Republic of Sudan ("Sudan"), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961. Sudan maintains an Embassy within the United States at 2210 Massachusetts Avenue, N W , Washington, D.C. 20008-2831.

53. Defendant Sudan has long provided material support and resources to al Qaida. According to the United States government, Sudan's support of al Qaida has included para-military training, indoctrination, money, travel documentation, safe passage and refuge in Sudan.

54. Defendant Sudan openly harbored defendant Osama bin Laden and many top al Qaida lieutenants between 1991 and 1996. During that time, the Sudanese government permitted Osama bin Laden to establish al Qaida training camps, set up front

companies to move assets and generate new revenues, and to use the cloak of Sudan's state sovereignty to shield al Qaida's operations.

55. In 1996, the Sudanese government permitted Osama bin Laden to move to Afghanistan, where he was welcomed as an honored guest of the ruling Taliban government, rather than surrendering him to international authorities for prosecution.

56. Defendant Sudan continues to harbor members of the al Qaida terrorist network, as well as members of affiliated FTOs, and has recently permitted al Qaida and other associated terrorist organizations to re-establish training camps within Sudan, and to otherwise use Sudan as a base to organize their operations and support compatriots elsewhere.

57. In addition to its extensive direct support of al Qaida, defendant Sudan has long provided material support and resources to defendants Egyptian Islamic Jihad and Hezbollah.

58. By virtue of its merger with Egyptian Islamic Jihad, and affiliation with Hezbollah, al Qaida has materially benefited from Sudan's sponsorship of those FTOs.

59. Defendant, Syrian Arab Republic ("Syria"), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

60. Defendant Syria has long provided material support and resources to defendant Hezbollah. According to the U.S. government, Syria has provided safe haven, financial and logistical assistance, training facilities and political support for Hezbollah. In addition, Syria has for many years facilitated weapons shipments from Iran to Hezbollah. As set forth above, Hezbollah is, in effect, an agency and instrumentality of the Syrian government.

61. By virtue of its affiliation with Hezbollah, al Qaida has materially benefited from Syria's sponsorship of that FTO.

62. Between 1992 and 2003, defendant Syria continually purchased crude oil from defendant Iraq, in violation of United Nations Security Council resolutions and sanctions programs designed to inhibit Iraq's ability to use funds derived from the sale of Iraq's natural resources to promote international terrorism and pursue the development of weapons of mass destruction. Through its state controlled bank, Syria assisted Iraq in laundering revenues realized by Iraq through the illegal oil sales, and through other illicit activities.

63. Syria's violations of the United Nations Security Council resolutions and sanctions programs, as described above, enabled Iraq to maintain and expand its terrorist sponsorship programs, including its provision of material support and resources to al Qaida and affiliated FTOs, persons, organizations, commercial entities and other parties.

64. Defendant Syria knew, or should have known, that al Qaida and affiliated FTOs, persons, organizations, commercial entities and other parties would materially benefit from Syria's illegal crude oil purchases from Iraq, and from the assistance Syria provided to Iraq in laundering revenues from the illegal oil sales and other illicit activities.

65. Defendant, Kingdom of Saudi Arabia ("Saudi Arabia"), is a foreign state within the meaning of 28 U.S.C. §1391(f). Saudi Arabia maintains an Embassy within the United States at 601 New Hampshire Avenue, N.W., Washington, D.C. 20037.

66. Defendant Saudi Arabia has long provided material support and resources to al Qaida, including financial and logistical assistance.

67. According to intelligence experts and officials of the U.S. government, Saudi Arabia has channeled literally millions of dollars to al Qaida, predominantly through various Saudi based "charities" under the government's effective control, including defendants Muslim World League, Al Haramain Foundation, International Islamic Relief Organization ("IIRO"), Benevolence International Foundation, Blessed Relief (Muwafaq) Foundation, Rabita Trust and World Assembly of Muslim Youth. Defendant Arafat Al-Asahi, the Director of IIRO in Canada and a full-time employee of Muslim World League, confirmed the Saudi government's control over Muslim World League and IIRO during Canadian court proceedings, testifying as follows:

Let me tell you one thing. The Muslim World League, which is the mother of IIRO, is a fully government-funded organization. In other words, I work for the Government of Saudi Arabia. I am an employee of that government. Second, the IIRO is a relief branch of that organization which means that we are controlled in all our activities and plans by the government of Saudi Arabia. Keep that in mind, please ... I am paid by my organization which is funded by the [Saudi] government. ... The [IIRO] office, like any other office in the world, here or in the Muslim World League, has to abide by the policy of the Government of Saudi Arabia. If anybody deviates from that, he would be fired; he would not work at all with IIRO or with the Muslim World League.

During a July 31, 2003 hearing before the Senate Committee on Governmental Affairs regarding terrorism financing, Dr. Dore Gold, the former Israeli Ambassador to the United Nations, similarly confirmed the Saudi government's control over several Saudi based "charities" responsible for funding al Qaida, stating as follows.

[I]t would be incorrect to view these charities as purely non-governmental organizations. ... [A]t the apex of each organization's board is a top Saudi official. The Saudi Grand Mufti, who is also a Saudi cabinet member, chairs the Constituent Council of the Muslim World League. The Saudi Minister of Islamic Affairs chairs the Secretariat of

the World Assembly of Muslim Youth and the Administrative Council of al-Haramain. All three organizations have received large charitable contributions from the Saudi royal family that have been detailed in Saudi periodicals.

68. Despite its express awareness, for several years prior to September 11, 2001, that Saudi "charities" were funneling contributions to al Qaida and other terrorist causes, Saudi Arabia continued to donate enormous sums of money to those organizations. Defendant Saudi Arabia knew, or should have known, that al Qaida and affiliated FTOs, persons, organizations, commercial entities and other parties would materially benefit from those contributions, and use the funds received from those "charities" to finance terrorist attacks against the United States, its nationals and allies.

69. Despite its express awareness, for several years prior to September 11, 2001, that Saudi "charities" were funneling contributions to al Qaida and other terrorist causes, Saudi Arabia failed to take appropriate and necessary steps to regulate those "charities" and otherwise prevent them from continuing to finance terrorism, in violation of its obligations under United Nations Security Council Resolutions 49/60, 1269, 1333 and 1363. In this regard, an Independent Task Force sponsored by the Council on Foreign Relations to investigate sources of al Qaida funding concluded as follows:

[It] is worth stating clearly and unambiguously what official U.S. government spokespersons have not: For years, individuals and charities based in Saudi Arabia have been the most important source of funds for al-Qaeda; and for years, Saudi officials have turned a blind eye to this problem.

70. Defendant Saudi Arabia knew, or should have known, that al Qaida and affiliated FTOs, persons, organizations, commercial entities and other parties would materially benefit from Saudi Arabia's failure to take appropriate and necessary steps to

regulate the "charities" which were funneling contributions to al Qaida and otherwise prevent those "charities" from continuing to finance terrorism

71. Defendants, Osama bin Laden; Muhammad Atif a/k/a Subhi Sitta a/k/a Abu Hafis al-Masri; Sayf al-Adl; Shaykh Sa'id a/k/a Mustafa Muhammad Ahmad; Abu Hafis the Mauritanian a/k/a Mahfouz Ould al-Walid a/k/a Khalid al-Shanqiti; Ibn al-Shaykh al-Libi; Abu Zubaydah a/k/a Zayn al Abidin Muhammad Husayn Tariq; Abd al-Hadi al-Iraqi a/k/a Abu Abdullah; Ayman al-Zawahiri; Thirwat Salah Shihata a/k/a Muhammad Ali; Tariq Anwar al-Sayyid Ahmad a/k/a Fathi a/k/a Amr al-Fatih; Muhammad Salah a/k/a Nasr Fahmi Nasr Hasanayn; Makhtab al-Khidamat a/k/a Al-Khifaf; Al-Itihaad al-Islamiya (AIAI); Islamic Army of Aden; Wafa Humanitarian Organization; Al-Rashid Trust; Mamoun Darkazanli Import-Export Company; Nurjaman Riduan Ismuddin a/k/a Hambali; Mohammed Iqbal Abdurrahman a/k/a/ Abu Jibril; Benevolence International Foundation; Benevolence International Fund; Bosanska Idealna Futura; Global Relief Foundation a/k/a Foundation Secours Mondial; Mounir El Motassadeq; Ramzi Binalshibh; Zakarya Essabar; Said Bahaji; Turkistan Islamic Movement; Wa'el Hamza Julaidan a/k/a Al-Hasan al Madani; Adel Ben Soltane; Nabil Benattia; Yassine Chekkouri; Riadh Jelassi; Mendi Kammoun; Samir Kishk; Tarek Ben Habib Maaroufi; Abdelhalim Remadna; Mansour Thaer; Lazhar Ben Mohammed Thili; Habib Waddani; Akida Bank Private Limited; Akida Investment Co. Ltd.; Nasreddin Group International Holding Ltd.; Nasco Nasreddin Holding A.S.; Nascotex S.A.; Nasreddin Foundation; BA Taqwa for Commerce and Real Estate Company Ltd.; Miga - Malaysian Swiss, Gulf and African Chamber; Gulf Center S.R.L.; Nascoservice S.R.L.; Nasco Business Residence Center SAS Di Nasreddin Ahmed Idris EC; Nasreddin Company Nasco SAS Di Ahmed Idris Nassneddin EC; Nada International Anstalt;

Nasreddin International Group Limited Holding; The Aid Organization of the Ulema; Ahmed Idris Nasreddin; Youssef Nada; Abdelkadir Mahmoud Es Sayed; Khalid Al-Fawaz; Abu Hamza Al-Masri; Mohamed Ben Belgacem Aouadi; Mokhtar Boughougha; Tarek Charaabi; Sami Ben Khemais Essid; Lased Ben Heni; Somalia Branch of the Al-Haramain Islamic Foundation; Bosnia-Herzegovina branch of Al-Haramain Islamic Foundation; Umma Tameer-E-Nau (UTN); Bashir-Ud-Din Mahmood; Abdul Majeed; S.M. Tufail; Al-Barakaat; Al Taqwa/Nada Group; Aaran Money Wire Service, Inc.; Al Baraka Exchange LLC; Al Barakaat Bank; Al-Barakat Bank of Somalia (BSS); Al-Barakat Finance Group; Al-Barakat Financial Holding Co.; Al-Barakat Global Telecommunications; Al-Barakat Group of Companies Somalia Limited; Al-Barakat International a/k/a Baraco Co; Al-Barakat Investments; Al-Barakat Wiring Service; Al Taqwa Trade, Property and Industry Company Limited; ASAT Trust; Bank al Taqwa Limited; Baraka Trading Company; Barakaat Boston; Barakaat Construction Company; Barakaat Enterprise; Barakaat Group of Companies; Barakaat International; Barakaat International Foundation; Barakaat International, Inc.; Barakaat North America, Inc.; Barakaat Red Sea Telecommunications; Barakaat Telecommunications Co. Somalia; Barakat Bank and Remittances; Barakat Computer Consulting (BCC); Barakat Consulting Group (BCG); Barakat Global Telephone Company; Barakat International Companies (BICO); Barakat Post Express (BPE); Barakat Refreshment Company; Barakat Wire Transfer Company; Barakat Telecommunications Company Limited (BTELCO); Barako Trading Company, LLC; Global Services International; Heyatul Ulya; Nada Management Organization; Parka Trading Company; Red Sea Barakat Company Limited; Somalia International Relief Organization; Somalia Internet Company; Somalia Network AB; Youssef M. Nada & Co. Gesellschaft MBH; Youssef

M. Nada; Hussein Mahmud Abdulkadir; Abdirasik Aden; Abbas Abdi Ali; Abdi
 Adulaziz Ali; Yusaf Ahmed Ali; Dahir Ubeidullahi Aweys; Hassan Dahir Aweys; Garad
 Jama; Ali Ghaleb Himmat; Albert Fredrich Armand Huber; Liban Hussein; Ahmed Nur
 Ali Jim'ale; Abdullahi Hussein Kahie; Mohammed Mansour; Zeinab Mansour-Fattah;
 Abdullah Ahmed Abdullah a/k/a Abu Mariam a/k/a Abu Mohamed Al-Masri a/k/a Saleh;
 Haji Abdul Manan Agha a/k/a Abd Al-Man'am Saiyid; Al-Hamati Sweets Bakeries;
 Muhammad Al-Hamati a/k/a Mohammad Hamdi Sadiq Al-Ahdal a/k/a Abu Asim Al-
 Makki; Amin Al-Haq a/k/a Dr. Amin Ah Haq a/k/a Muhammad Amin a/k/a Dr. Amin Ul-
 Haq; Saqar Al-Sadawi; Ahmad Sa'Id Al-Kadr a/k/a Abu Abd Al-Rahman Al-Kanadi;
 Anas Al-Liby a/k/a Anas Al-Libi a/k/a Nazim Al-Raghie a/k/a Nazih Abdul Hamed Al-
 Raghie a/k/a Anas Al-Sabai; Ahmad Ibrahim Al- Mughassil a/k/a Abu Omran a/k/a
 Ahmed Ibrahim Al-Mughassil; Abdelkarim Hussein Mohamed Al-Nasser; Al-Nur Honey
 Press Shops a/k/a Al-Nur Honey Center; Yasin Al-Qadi a/k/a Shaykh Yassin Abdullah
 Kadi a/k/a Yasin Kahdi; Sa'D Al-Sharif; Al-Shifa' Honey Press for Industry and
 Commerce; Ibrahim Salih Mohammed Al-Yacoub; Ahmed Mohammed Hamed Ali a/k/a
 Ahmed Mohammed Abdurehman a/k/a Abu Fatima a/k/a Abu Islam a/k/a Abu Khadijah
 a/k/a Ahmed Hamed a/k/a Ahmed the Egyptian a/k/a Ahmed Ahmed a/k/a Ahamad Al-
 Masri a/k/a Abu Islam Al-Surir a/k/a Ahmed Mohammed Ali a/k/a Hamed Ali a/k/a
 Ahmed Hemed a/k/a Ahmed Shieb a/k/a Shuaib; Ali Atwa a/k/a Ammar Mansour
 Bouslim a/k/a Hassan Rostom Salim; Muhsin Musa Matwalli Atwah a/k/a Abdel Rahman
 a/k/a Abdul Rahman a/k/a Abdul Rahman Al-Muhajir a/k/a Mohammed K.A. Al-Namer;
 Bilal Bin Marwan; Ayadi Chafiq Bin Muhammad a/k/a Ben Muhammad Aiadi a/k/a Ben
 Muhammad Aiady a/k/a Ben Muhammad Ayadi Chafik a/k/a Ben Muhammad Ayadi
 Shafiq; Mamoun Darkazanli; Ali Saed Bin Ali El-Hoorie a/k/a Ali Saed Bin Ali Al-Houri

a/k/a Ali Saed Bin Ali El-Houri; Mustafa Mohamed Fadhil a/k/a Abd Al Wakil Al Masri
 a/k/a Abu Al-Nubi a/k/a Hassan Ali a/k/a Abu Anis a/k/a Moustafa Ali Elbishy a/k/a
 Mustafa Muhammad Fadil a/k/a Mustafa Fazul a/k/a Hussein a/k/a Abu Jihad a/k/a Khalid
 a/k/a Nu Man a/k/a Mustafa Mohammed a/k/a Abu Yussrr; Ahmed Khalfan Ghailani
 a/k/a Ahmed the Tanzanian a/k/a Foopie a/k/a Fupi a/k/a Abu Bakr Ahmad a/k/a A.
 Ahmed a/k/a Abubakar Ahrmed a/k/a Abubakar K. Ahmed a/k/a Abubakar Khalfan
 Ahmed a/k/a Abubakary K. Ahmed a/k/a Ahmed Khalfan Ahmed a/k/a Ahmad Al
 Tanzani a/k/a Ahmed Khalfan Ali a/k/a Abu Bakr a/k/a Abubakary Khalfan Ahmed
 Ghailani a/k/a Ammed Ghailani a/k/a Ahmad Khalafan Ghilani a/k/a Mahafudh
 Abubakar Ahmed Abdallah Hussein a/k/a Abu Khabar a/k/a Ahmed Khalfan a/k/a Shariff
 Omar Mohammed; Riad Hijazi a/k/a Abu-Ahmad Al-Amriki a/k/a Abu-Ahmad Al-
 Hawen a/k/a Rashid Al-Maghribi a/k/a Abu-Ahmad Al-Shahid a/k/a M Raed Hijazi;
 Hasan Izz-Al-Din a/k/a Ahmed Garbaya a/k/a Sa-Id a/k/a Samir Salwwan; Jaish-I-
 Mohammed a/k/a Army of Mohammed; Jam'Yah Ta'Awun Al-Islamia a/k/a Jam'Iyat Al
 Ta'Awun Al Islamiyya a/k/a JIT a/k/a Society of Islamic Cooperation; Mufti Rashid
 Ahmad Ladehyanoy a/k/a Mufti Rasheed Ahma a/k/a Mufti Rashid Ahmad Ludhianvi
 a/k/a Mufti Rashid Ahmad Wadehyanoy; Fazul Abdullah Mohammed a/k/a Fazul
 Abdalla a/k/a Fazul Adballah a/k/a Abu Aisha a/k/a Abu Seif Al Sudani a/k/a Fadel
 Abdallah Mohammed Ali a/k/a Abdalla Fazul a/k/a Abdallah Fazul a/k/a Abdallah
 Mohammed Fazul a/k/a Haroon Fazul a/k/a Harun Fazul a/k/a Haroon a/k/a Fadhil
 Haroun a/k/a Harun a/k/a Abu Luqman a/k/a Fazul Mohammed a/k/a Fazul Abdilahi
 Mohammed a/k/a Fouad Mohammed a/k/a Fadil Abdallah Muhamad; Khalid Shaikh
 Mohammed a/k/a Salem Ali a/k/a Fahd Bin Abdallah Bin Khalid a/k/a Ashraf Refaat
 Nabith Henin a/k/a Khalid Abdul Wadood; Fahid Mohammed Ally Msalam a/k/a Usama

Al-Kini a/k/a Fahid Mohammed Ally a/k/a Fahad Ally Msalam a/k/a Fahid Mohammed Ali Msalam a/k/a Mohammed Ally Msalam a/k/a Fahid Mohammed Ali Musalaam a/k/a Fahid Muhamad Ali Salem; RabitaTrust; Ansar al-Islam (AI) a/k/a Jund al-Islam; Youssef Abdaoui a/k/a Abu Abdullah a/k/a Abdellah a/k/a Abdullah; Mohammed Amine Akh a/k/a Samir a/k/a Kali Sami a/k/a Elias; Mohrez Amdouni a/k/a Fabio Fusco a/k/a Mohammed Hassan a/k/a Tuale Abu; Chiheb Ben Mohamed Ayari a/k/a Abu Hohem Hichem; Mondher Baazaoui a/k/a Hamza; Lionel Dumont a/k/a Bilal a/k/a Hamza a/k/a Jacques Brougere; Moussa Ben Amor Essaadi a/k/a Dah Dah a/k/a Abdelrahmman a/k/a Bechir; Rachid Fehar a/k/a Aminedel Belgio a/k/a Djaffar; Brahim Ben Hedili Hamami; Khalil Jarraya a/k/a Khalil Yarraya a/k/a Aziz Ben Narvan Abdel' a/k/a Amro a/k/a Omar a/k/a Amrou a/k/a Amr; Mounir Ben Habib Jerraya a/k/a Yarraya; Fouzi Jendoubi a/k/a Said a/k/a Samir; Fethi Ben Rebai Masri a/k/a Amor a/k/a Omar Abu a/k/a Fethi Alic; Najib Ouaz; Ahmed Hasni Rarrbo a/k/a Abdallah a/k/a Abdullah; Nedat Saleh a/k/a Hitem; Abdelghani Mzoudi; Gulbuddin Hekmatyar; Imad Mughniyeh; Muhammad Omar; Islamic International Brigade; Special Purpose Islamic Regiment; and Riyadhus-Salikhin Recognizance and Sabotage Battalion of Chechen Martyrs, have been designated as supporters and associates of terrorists by the U.S. government, pursuant to Executive Order 13224, based on their material support and sponsorship of, or affiliation with, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons

72. Defendants Princess Haifa Al-Faisal; Prince Vandar Iban Sultan; Osama Bassnan; Omar Al-Bayoumi; Fahad Al-Thumairy; World Assembly of Muslim Youth; Sheikh Ahmed Salim Swedan; Muhammad Abu-Islam; Abdullah 'Qassim; Hashim Abdulrahman; Jamal Al-Badawi; Mohammed Omar Al-Harazi; Walid Al-Sourouri; Fatha Adbul Rahman; Yasser Al-Azzani; Jamal Ba Khorsh; Ahmad Al-Shinni; Jamil Qasim

Saeed; Abu Abdul Rahman; Mohamed Bayazid; Abu Musab Zarqawi; Sheikh Omar Bakri Muhammad; Abdul Fattah Zammar; Ghasoub Al Abrash Ghalyoun a/k/a Abu Musab; Bensayah Belkacem; Sabir Lamar; Wadih El-Hage; Wali Khan Amin Shah; Zacarias Moussaoui; The Taliban; Maulvi Abdul Kabir; Jalil Shinwari; Noor Jalil; Abdel Hussein; Adu Agab; National Islamic Front; Hassan Turabi; Iss El-Din El Sayed; Lashkar Redayan-E-Islami; Ahmad Salah a/k/a Salim; Abd Al-Mushin Al-Libi; Abdul Rahman Khaled Bin Mahfouz; Abdul Rahman Yasin; Abdulla Al Obaid; Abdula Bin Laden; Advice and Reformation Committee; Afghan Support Committee; Al Khaleejia for Export Promotion and Marketing Company; Al-Haramain a/k/a Al-Haramain Foundation; Enaam M. Arnanout; International Development Foundation; International Islamic Relief Organization; International Institute of Islamic Thought; Islamic Cultural Institute of Milan; Jamal Barzinji; Khaled Bin Mahfouz; Mohammed Jamal Khalifa; Mohammed Salim Bin Mahfouz; Muslim World League; National Commercial Bank; Prince Nayef Bin Abdulaziz Al Saud; Prince Sultan Bin Abdulaziz Al Saud; Rabih Haddah; SAAR Foundation; Saudi Sudanese Bank; Al Shamal Islamic Bank ;Sheikh Abu Bdul Aziz Nagi; Sheik Adil Galil Batargy a/k/a Adel Abdul Jalil Batterjee; Suleiman Abdel Aziz Al Rajhi; Taba Investments; Tanzanite King; Ulema Union of Afghanistan; Wadi Al Aqiq; Infocus Tech of Malaysia; Yazid Sufaat of Kuala Lumpur Malaysia; Al-Shaykh Al-Iraqi; Azzam Service Center; Abu Hajer Al Iraqi; Mohammed Al Faisal Al Saud; Al-Hijrah Construction and Development Limited; Gum Arabic Company Limited; Al Shamal For Investment and Development; Saleh Abdullah Kamel; Al Baraka Investment and Development; Saudi Dallah Al Baraka Group LLC; Islamic Investment Company of the Gulf; Dar-Al-Maal Al Islami; Al-Bir Saudi Organization; Mohammad S. Mohammad; Tadamon Islamic Bank; Mustasim Abdel-Rahim; National Fund for Social

Insurance; Abdul-Rahim Mohammed Hussein; Al Amn Al-Dakhili; Al Amn Al-Khariji;
 Abd Al Samad Al-Ta'ish; Mohamed Sadeek Odeh; Abdel Barry; Ahmad Salah a/k/a
 Salim; Mahdi Chamran Savehi; Mohammed Sarkawi; Al Tawhid; Haji Mohamad Akram;
 Abdallah Omar; Umar Faruq; Abd Al-Rahim Al-Nashiri; Turki Al Faisal Al Saud a/k/a
 Prince Turki; Prince Abdullah Al Faisal Bin Abdulaziz Al Saud a/k/a Prince Abdullah;
 Prince Salman Bin Abdul Aziz Al Saud a/k/a Prince Salman; Zouaydi a/k/a Muhammed
 Galeb Kalaje Zoaaydi a/k/a Abu Talha; Mullah Kakshar; Abdulaziz Bin Abdul Rahman
 Al Saud; Arafat El-Asahi; Haydar Mohamed Bin Laden; Mohammed Bin Abdulrahman
 Al Aricfy; Faisal Group Holding Company; Al Faisaliah Group; Bashish Hospital;
 Mushayt for Trading Establishment; Abdullah Bin Abdul Muhsen Al Turki a/k/a Al
 Turki; Saudi High Commission a/k/a The Saudi High Relief Commission; Abdul Aziz Al
 Ibrahim a/k/a Al Ibrahim; Tarek Ayoubi; Al Anwa; Help African People; Ibrahim Bin
 Abdul Aziz Al Ibrahim Foundation; Mercy International Relief Agency; Islamic
 Movement of Uzbekistan; Saudi Bin Laden Group; Bakr M. Bin Laden; Salem Bin
 Laden; Saleh Gazaz; Mohammed Bahareth; Abdullah Bin Said; Mohammed Nur Rahmi;
 Tarek M. Bin Laden; Omar M. Bin Laden; Mohammed Bin Laden Organization; Saudi
 Bin Laden International Company; Yeslam M. Bin Laden; Global Diamond Resource;
 Human Concern International Society; Talal Mohammed Badkook; Dr. Mohaman Ali
 Elgari; New Diamond Holdings; M.M. Badkook Company for Catering & Trading; Al-
 Mustaqbal Group; National Management Consultancy Center; Al-Rajhi Banking &
 Investment Corporation; Saleh Abdulaziz Al-Rajhi; Abdullah Sulaiman Al-Rajhi; Khalid
 Sulaiman Al-Rajhi; Al-Watania Poultry; Mar-Jac Poultry; Mar-Jac Investments, Inc.;
 Piedmont Poultry; Salim Bin Mahfouz; SNCB Corporate Finance Limited; SNCB
 Securities Limited in London; SNCB Securities Limited in New York; Saudi Economic

and Development Company; Zakat Committee; Red Crescent Saudi Committee; Blessed Relief Foundation; Abdulkarim Khaled Uusuf Abdulla; Abdulrahman Bin Khalid Bin Mahfouz; Al-Birr; Hisham; Hezb-e-Islami; Saif Al Islam El Masry; Syed Suleman Ahmer; Mazin M.H. Bahareth; Shahir Abdulraoof Batterjee; Zahir H. Kazmi; Muzaffar Khan; Soliman J. Khudeira; Jamal Nyrabeh; Ahmad Ajaj; Success Foundation; Abdulrahman Alamoudi; American Muslim Foundation; Mohammed Omeish; Adnan Basha; Mahmoud Jaballah; Arafat El-Ashi; Moro Islamic Liberation Front; Jamal Ahmed Mohammed; Mohammed Khatib; Saudi Joint Relief Committee; Taibah International Aid Association; Islamic African Relief Agency; Tarik Hamdi; Fazeh Ahed; Sanabil Al-Khair; Sana-Bell, Inc.; Sanabel Al-Kheer, Inc.; Khaled Nouri; Abdullah M. Al-Mahdi; Tareq M. Al-Swaidan; Abdul Al-Moslah; Salah Badahdh; Hassan A.A. Bahfzallah; M. Yaqub Mirza; Ihab Ali; Samir Salah; Ibrahim Hassabella; Hisham Al-Talib; Abu Sulayman; Ahmed Totonji; Iqbal Yunus; M. Omar Ashraf; Mohammed Jaghlit; Muhammad Ashraf; Sherif Sedky; African Muslim Agency; Aradi, Inc.; Grove Corporate, Inc.; Heritage Education Trust; Mena Corporation; Reston Investments, Inc.; Safa Trust; Sterling Charitable Gift Fund; Sterling Management Group; York Foundation; National Development Bank; Dallah Avco Trans Arabia Co. Ltd.; Omar Al Bayoumi a/k/a Abu Imard; Masjed Al Madinah Al Munawarah a/k/a Masjid Al Madinah Al Munawarah; Aqsa Islamic Bank; Aqeel Al-Aqeel; Mansouri Al-Kadi; Soliman H.S. Al-Buthe; Perouz Seda Ghaty; Ahmed Ibrahim Al Najjar; Adel Muhammad Sadiq Bin Kazem; Saudi American Bank; Abdulaziz Bin Hamad; Khalil A. Kordi; Rashid M. Al Romaizan; Abdulaziz Bin Hamad Al Gosaibi; Saudi Cement Company in Damman; Omar Sulaiman Al-Rajhi; Arab Cement Company; Zeinab Mansour-Fattouh; Mohammed Chehade; Hazem Ragab; Mohammed Alchurbaji; Mustafa Al-Kadir; Abu Al-Maid; Al

Shamal Islamic Bank a/k/a Shamel Bank a/k/a Bank El Shamar; Sulaiman Al-Ali; Khaled Nouri; Muslim World League offices; Abdullah Bin saleh Al-Obaid; Taha Jaber Al-Alwani; International Institute of Islamic Thought; Ibrahim S. Abdullah; Mohammed Bin Faris; Dr. Mahmoud Dakhil; Mohammed Al Faisal Al Saud; Abdul Rahman Al Swailem; Delta Oil Company; Nimir, LLC; Arab Bank, PLC; Dubai Islamic Bank; Nada Management Organization, SA; Ary Group; Islamic Cultural Center of Geneva; Hani Ramadan; The Committee for the Defense of Legitimate Rights; Proyectos Y Promociones Iso; Afamia, SL; Cobis; Abrash Company; Promociones Y Construcciones Tetuan Pricote, S.A.; Contratas Gioma; Eurocovia Obras, S.A.; Proyectos Y Promociones Paradise, S.L.; Proyectos Edispan; Ghasoub Al Abrash; Mustaf Ahmed Al-Hisawi a/k/a Sheik Saeed; Imad Eddin Barakat Yarkas a/k/a Abu Dahdah; Muhammed Galeb Kalaje Zuoyadi a/k/a Abu Talha; Bassam Dalati Satut; Abdalrahman Alarnout Abu Aljer a/k/a Abu obed; Mohammed Khair Al Saqqa a/k/a Abu Al Darda; Ghasoub Al Abrash Ghalyoun a/k/a Abu Musab; Mohammed Ali Sayed Mushayt; Mohammed Hussein Al-Amoudi; Abu Qatada Al-Filistini a/k/a Abu Ismail a/k/a Abu Umar a/k/a Abu Omar Omar a/k/a Abu Umar Takfiri a/k/a Abu Umar umar a/k/a Ali-Samman Uthman a/k/a Omar Mahmoud Uthman a/k/a Umar Uthman; Yassir Al-Sirri a/k/a Ammar; Mohammed Al Massari; Lujain Al-Iman; Ziyad Khaleel; Ibrahim Bah; Abu Zubaydah; Mamdouh Mahmud Salim a/k/a Abu Hajer Al Iraqi; Sheikh Abdullah Azzam a/k/a Abu Muhammed; Abdullah Samil Bahmadan; Essam Al Ridi; Omar Abu Omar; Mohammed Ali Hasan Al Moayad; Al Farooq Mosque; Yousef Jameel; Ibrahim Muhammed Afandi; Mohammed Bin Abdullah Al-Jomaith; Abdulrahman Hassan Sharbatly; Salahuddin Abduljawad; Ahmed Zaki Yamani; Ahmad Al Harbi; Mohammed Al-Issai; Hamad Hussaini; Abu Rida Al Suri a/k/a Mohammed Loay Bayazid; Saudi Red Crescent;

Ahmed Brahim; Abu Musab Al-Zarqawi; Abu Ibrahim Al-Masri; Dar Al Maal Al Islami Trust; DMI Administrative Services, S.A.; Islamic Assembly of North America; Salman Al-Ouda; Safar Al-Hawali; Saleh Al-Hussayen; Sami Omar Al-Hussayen; Muhammed J. Fakihi; Queen City Cigarettes and Candy; Agus Budiman; Al-Baraka Bankcorp, Inc.; Ahmed Ressam; Said Bahaji; Zakariya Essabar, have aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons.

II. JURISDICTION

73. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1332(a)(2) (diversity), and 28 U.S.C. § 1350 (Alien Tort Claims Act).

74. The jurisdiction of this Court over defendants Iran, Iraq, Sudan, Syria and Saudi Arabia is invoked pursuant to 28 U.S.C. § 1330, as the claims against those defendants fall within the exceptions to immunity set forth at 28 U.S.C. §§ 1605(a)(2), 1605(a)(5) and 1605(a)(7) (Foreign Sovereign Immunities Act).

75. Venue in this district is proper pursuant to § 408(b)(3) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, and 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1).

III. FACTUAL BACKGROUND

76. On September 11, 2001, nineteen (19) members of the al Qaida terrorist network hijacked four (4) commercial airliners, and used those planes as weapons in a coordinated terrorist attack on the World Trade Center Complex in New York and the Pentagon in Arlington, Virginia (the "September 11th Attack").

77. The September 11th Attack resulted in the tragic loss of several thousand lives, personal injuries to countless other persons, and property damage on a catastrophic scale, including the complete destruction of the World Trade Center Complex.

78. The September 11th Attack was a direct, intended and foreseeable product of a larger conspiracy among the defendants to commit acts of international terrorism against the United States, its nationals and allies.

79. The conspiracy among the defendants to commit acts of international terrorism against the United States, its nationals and allies, included the provision of material support and resources to defendant al Qaida and affiliated foreign states, FTOs, persons, organizations, commercial entities and other parties, as discussed above.

80. Absent the material support and resources provided by the co-defendants, both directly and indirectly, al Qaida would not have possessed the financial resources, physical assets, membership base, technological knowledge, communication skills, and global reach required to conceive, plan and execute the September 11th Attack.

81. At the time of the September 11th Attack, plaintiff Federal provided insurance coverage to the corporations, companies, partnerships, affiliations, persons, trusts and other parties identified in Column A of Exhibit A hereto, relative to property and/or business interests located at the corresponding addresses identified in Column B of Exhibit A.¹ In accordance with the terms of the applicable policies of insurance, plaintiff Federal has made payments to the insureds identified in Exhibit A in an aggregate amount in excess of \$929,593,306, as set forth in greater detail in Column D of Exhibit A, and expects that it will make additional payments in the future, in compensation for damages resulting from the September 11th Attack. By virtue of its payments to its

¹ Exhibit A is expressly incorporated herein by reference.